

U.S. District Court
N.D. OF N.Y.
FILEDUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

MAR 29 2017

LAWRENCE K. BAERMAN, CLERK
ALBANY*Reverend*
Donald W. Elliott Plaintiff(s)

vs.

ACCVB of NYS Defendant(s)

Civil Case No.:

*1:17-cv-355*CIVIL
RIGHTS*(GTS/DJS)*COMPLAINT
PURSUANT TO
42 U.S.C. § 1983Plaintiff(s) demand(s) a trial by: ☐ JURY ☒ COURT (Select only one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(3) and (4) and 2201.

PARTIES

2. Plaintiff:

Address:

*Reverend Donald W. Elliott**13 Ridge Lane**Box 193**East Berne NY 12059**+1-518-669-0629*
cell

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant:

Official Position:

Address:

*ACCVB of NYS**Michelle Vennard**CEO**Quackenbush Square**Albany N.Y.*

b. Defendant: _____
Official Position: _____
Address: _____

c. Defendant: _____
Official Position: _____
Address: _____

Additional Defendants may be added on a separate sheet of paper.

4. **FACTS**

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).

ACCUB of NYS has been using, selling, publishing giving away my copyrighted original artist photos for years. Recently discovered, I had contacted them with a very modest bill to cover two photos but indicated more billing to follow once the number of incidents of publication constituted by a single paper publication, new, ie magazine or print. This requires a contract and properly release with identifiers as to volume of publication. Ask me for any example of this.

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Example - 1999 Cover of Esquire magazine indicates a story about the crocodile hunter is Australia. My photos were paid for and release to paper publication of Nat. magazine. 4 photos = 2000.00 fair market value price in 1999. If those photos inside ever make it to the web, the responsible party will be required to pay. Each refresh of a web page constitutes a single act of publishing. This was awarded in the court system of NYS in 1999-2000 and file by ASMP in NY. The photographer was awarded 150,000.00 per infringement ie per publication. It's on the books still and was designed to deter and copyright photo theft issues in the future. Here we are gentlemen. Truly believe that the very laws that limit us are the very laws that protect me from financial rape. The State of New York is financial bankrupt as of weeks ago according to the laws on the Books. I personally own the State of New York on paper. My humble payment plan offer must be honored and I will assist in fixing future problems for the

5.

CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

FIRST CAUSE OF ACTION

Copyright Infringement

SECOND CAUSE OF ACTION

As Above

THIRD CAUSE OF ACTION

As Above

6. PRAYER FOR RELIEF

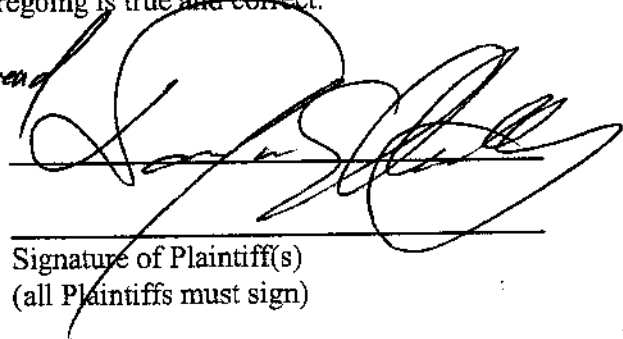
WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

I wish to be paid my minimum bill of
50,000,000.00 by April 10th as asked
and the rest we can figure if so all
parties are satisfied

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 3/29/2017

Reverend



Signature of Plaintiff(s)
(all Plaintiffs must sign)

02/2010